

Appl. No. : 10/672,906
Filed : September 25, 2003

REMARKS

In response to the final Office Action mailed March 21, 2007, Applicant has amended the application as above. No new matter is added by the amendments as discussed below. Applicant respectfully requests the entry of the amendments and reconsideration of the application in view of the amendments and the remarks set forth below.

Discussion of Claim Amendments

Claims 21 and 30 have been amended. Upon the entry of the amendments, Claims 21-38 are pending in this application. The amendments to Claims 21 and 30 are supported by, for example, Figure 3B. Thus, the amendments to the claims do not introduce any new matter. Entry of the amendments is respectfully requested.

Discussion of Claim Rejections Under 35 U.S.C. § 102(e)

The Examiner has rejected Claims 21, 28-30 and 37-38 under 35 U.S.C. § 102(e) as being anticipated by Noh, et. al (U.S. Patent No. 6,646,707). Applicant respectfully submits that Claims 21, 28-30 and 37-38 are allowable over the Noh reference as discussed below.

Standard of Anticipation

“For a prior art reference to anticipate a claim under 35 U.S.C. § 102, every element of the claimed invention must be identically shown in a single reference.” *Diversitech Corp. v. Century Steps, Inc.*, 850 F.ed 675, 677, 7 USPQ 2d 1315, 1317 (Fed. Cir. 1988).

Discussion of Patentability of Independent Claims 21 and 30

Each of independent Claims 21 and 30 recites, among other things, a second substrate corresponding to the first substrate and *a conductor electrode disposed on the second substrate*. Applicant respectfully submits that Noh does not disclose the above-recited feature as discussed below.

Noh discloses that a counter electrode (arguably corresponding to the claimed conductor electrode), made of transparent conductor, is disposed in a plate form in the pixel formed on a first substrate. *See col. 3, lines 45-52*. Noh further discloses:

Although it is not shown in the drawings, a color filter substrate having a structure that elements such as black matrix and color filter are formed on a

Appl. No. : 10/672,906
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second transparent insulating substrate, is arranged with a predetermined distance from the above array substrate. And a liquid crystal layer (not shown) including a plurality of positive or negative liquid crystal molecules is interposed between the substrates. Also, a first and a second alignment layers are formed on the inner sides of the array substrate and the color filter substrate and a first and a second polarizing plates are formed on the outer sides of the array substrate and the color filter substrate.

See col. 4, lines 5-16.

In view of the above, it is clear that the counter electrode of the Noh reference is not formed on the second substrate. Thus, Applicant respectfully submits that Noh does not disclose or teach "a conductor electrode disposed on the second substrate." In view of the above, Applicant respectfully submits that independent Claims 21 and 30 are not anticipated by Noh and thus the independent claims are allowable over the prior art reference.

Discussion of Patentability of Dependent Claims

Claims 28-29 and 37-38 depend from base Claim 21 or 30, and further define additional technical features of the present invention. In view of the patentability of their base claims, and in further view of the additional technical features, the dependent claims are patentable over the cited references. Furthermore, Applicant does not necessarily agree with the characterization of the prior art and claims made with respect to these claims. Withdrawal of the rejections is respectfully requested.

Discussion of Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner has rejected Claims 22-27 and 31-36 under 35 U.S.C. § 103(a) as being unpatentable over Noh in view of Kim (U.S. Patent No. 6,771,343). Applicant respectfully submits that pending Claims 22-27 and 31-36 are allowable over the prior art of record as discussed below.

Applicant respectfully submits that each of independent Claims 21 and 30 are allowable over Noh and Kim. Noh states:

Therefore, it is essential to prevent the color shift in order to improve screen quality of FFS mode LCD. As an effort to obtain improved screen quality, as shown in FIG. 2A, a pixel electrode 19 may have fracture slits S having a shape of "<" in a pixel. Alternatively, as shown in FIG. 2B, it has been

Appl. No. : 10/672,906
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proposed that the pixel electrode 19 has a structure that each pixel has a slit S in a slant direction symmetrical with the adjacent pixel. In the above structures, an electric field is generated in one pixel or in two symmetrical directions between adjacent pixels, thereby compensating refractive anisotropy of liquid crystal molecules and as a result, it is possible to prevent color shift.

See column 2, lines 16-27.

It can be seen from the above that the Noh device requires slanted slits in order to achieve its intended purpose. However, the Kim device discloses straight (or parallel) slits (see Figures 1A, 1C, 2A and 2C). In view of the above, Applicant respectfully submits that a skilled person would not have combined Noh and Kim because the slit structures of the two devices are incompatible with each other, and the combination would be inoperable. Thus, Applicant respectfully submits that independent Claims 21 and 30 are allowable over the prior art references. *MPEP 2143.01.*

Claims 22-27 and 31-36 depend from base Claim 21 or 30, and further define additional technical features of the present invention. In view of the patentability of their base claims, and in further view of the additional technical features, the dependent claims are patentable over the cited references. Furthermore, Applicant does not necessarily agree with the characterization of the prior art and claims made with respect to these claims. Withdrawal of the rejections is respectfully requested.

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CONCLUSION

In view of Applicant's foregoing amendment and remarks, it is respectfully submitted that the present application is in condition for allowance. Should the Examiner have any remaining concerns which might prevent the prompt allowance of the application, the Examiner is respectfully invited to contact the undersigned at the telephone number appearing below.


Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: _____

6/20/07

By: _____


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